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A6010
90401
DEPT. 20
KEVIN C.
BRAZIL

FILED
Superior Court Of California
County Of Los Angeles

JUN 16 2014

Sherri K. [Signature] Executive Officer/Clerk
By [Signature] Deputy
Jud. Lane

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

11 ROSLAND CAPITAL LLC, a California
12 limited liability company, MARIN ALEKSOV,
13 an individual, and MEL ZIONTZ, an
14 individual.

13 Plaintiffs,

14 vs.

15 DOE NOS. 1-25, inclusive,

16 Defendants.

No.

BC548822

COMPLAINT FOR: (1) LIBEL PER SE;
(2) TRADE LIBEL; (3) INTENTIONAL
INTERFERENCE WITH PROSPECTIVE
ECONOMIC ADVANTAGE; (4)
NEGLIGENT INTERFERENCE WITH
PROSPECTIVE ECONOMIC
ADVANTAGE; (5)
MISAPPROPRIATION OF TRADE
SECRETS; AND (6) EXTORTION

JURY TRIAL DEMANDED

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

06/16/2014

RECEIPT #: COH520872085
DATE PAID: 06/16/14 03:21 PM
PAYMENT: \$435.00
RECEIVED:
CHECK:
CASH:
CHANGE:
CARD:
\$435.00
\$0.00
\$0.00
\$0.00
\$0.00

CIT/DOGE: BC548822
LEA/DEF#:

ORIGINAL

1. Plaintiff Rosland Capital LLC (hereafter "Rosland"), Plaintiff Marin Aleksov (hereafter "Aleksov"), Plaintiff Mel Ziontz (hereafter "Ziontz") (collectively hereafter, "Plaintiffs"), by and through their counsel of record, Dentons US LLP, bring this Complaint for libel per se; trade libel; intentional interference with prospective economic advantage; negligent interference with prospective economic advantage; misappropriation of trade secrets; and extortion against Defendants Doe Nos. 1 through 25 (collectively hereafter, "Defendants") and allege as follows:

PARTIES

2. Rosland is and was, at all times herein mentioned, a Delaware limited liability company with a principal place of business in Santa Monica, California.

3. Aleksov is Chief Executive Officer ("CEO") of Rosland, who conducts business and resides in Los Angeles County.

4. Ziontz is legal counsel for Rosland, who practices law and resides in Los Angeles County.

5. Plaintiffs are ignorant of the true names and capacities of defendants sued as Doe Nos. 1 through 25, inclusive, and therefore sues Defendants by these fictitious names. Plaintiffs will amend this Complaint to allege their true names and capacities when they have been ascertained. Plaintiffs are informed and believe and thereon allege that each of the fictitiously named Defendants is tortiously or otherwise legally responsible in some manner for the occurrences alleged in this Complaint and for Plaintiffs' damages.

6. Plaintiffs are informed and believe and thereon allege that, at all relevant times, each of the defendants, including Doe Nos. 1 through 25, inclusive, was the agent or employee of each of the remaining defendants and, in doing the things alleged, was acting within the scope of that agency or employment.

JURISDICTION AND VENUE

7. Plaintiffs are informed and believe and thereon allege that Defendants, and each of them, have residences in, have conducted and/or conduct business in the State of California and are subject to personal jurisdiction in this state.

06/16/2014

1 8. The acts alleged herein occurred and the damages to Plaintiffs were inflicted and
2 occurred in substantial part in the State of California and within the county of Los Angeles.

3 9. The actions and events which are the subject of this action occurred in the county
4 of Los Angeles.

5 **GENERAL ALLEGATIONS**

6 10. Rosland has been a leading precious metals asset firm in the precious metals
7 industry since its inception in 2008. Rosland's founder and CEO is Aleksov, a twenty-year
8 veteran of the precious metals industry.

9 11. Ziontz has acted as general counsel for Rosland since its founding in 2008, and has
10 been a practicing attorney since 1967.

11 12. Plaintiff Ziontz, during the 47 years he has practiced as an attorney, has cultivated
12 an unblemished disciplinary record with the State Bar of California and is widely known by
13 clients, colleagues, and members of the bar as having an impeccable reputation.

14 13. Both Rosland and Aleksov have acquired considerable goodwill and positive
15 business reputations in the precious metals industry and among Rosland's clients. Rosland
16 prides itself on its commitment to customer service and satisfaction.

17 14. The purchase and sale of precious metals depends on the confidence of Rosland
18 and Aleksov's clients, who would be unlikely to entrust personal information to or enter into
19 transactions with a company or individual they consider disreputable.

20 15. Rosland's business is such that it develops long-term relationships with clients who
21 engage in multiple transactions over time for the purchase and sale of precious metals.

22 16. Rosland and Aleksov have spent a significant amount of time, effort, and money in
23 the development, compilation, and maintenance of Rosland's client list, and undertake all
24 reasonable efforts to maintain the confidentiality of that list.

25 17. On February 16, 2014, Aleksov received an anonymous email from
26 roslandcapitalrippedmeoff@gmail.com with the subject "pay your bills." The body of the email
27 continued, "or I shoot your golden goose - next week. with a shot gun."

28 18. Aleksov did not respond to the February 16th email.

19. On February 24, 2014, Plaintiff Aleksov received a second anonymous email from the same email address with the subject "Pay your bills Marin." The body of the email continued, "The emails will start this week. Pay your bills or I tell all your customers what a terrible business Rosland Capital is. Do not be foolish. More damage can be done with what I have at my disposal. Pay your bills. Or else."

20. Aleksov did not respond to the February 24th email.

21. On March 5, 2014, Defendants sent an anonymous email from the email address "roslandcapitalrippedmeoff@gmail.com" with the subject "Rosland Capital Is a Rip Off" to approximately 475 clients of Rosland and Aleksov.

22. The March 5th email further states: "Do not do business with Rosland Capital. They are ripping you off and laughing all the way to the bank. Marin Aleksov is a thief that is being investigated on multiple levels. If you know what is good for you, you will buy your gold elsewhere. Consider this a fair warning. BUYER BEWARE. DO NOT PURCHASE FROM ROSLAND CAPITAL."

23. From February 6, 2014 through and including May 20, 2014 a number of Twitter messages were posted on a Twitter site called "RoslandCapitalRipOff@RoslandRipOff". At least two of the postings specifically called Rosland a "rip off," Aleksov a "thief," and Ziontz a "crook."

24. Defendants Doe Nos. 1 through 25, without any support or basis in fact, published false statements accusing Rosland, Aleksov, and Ziontz of dishonest business practices. These defamatory statements were directed towards Plaintiffs' actual and potential clients and intended to deter those clients from doing business with Plaintiffs.

25. The false statements, by Defendants Doe Nos. 1 through 25, would reasonably be understood by others to mean that Aleksov and Ziontz had committed crimes.

26. Defendants Doe Nos. 1 through 25 have caused Plaintiffs pecuniary damage as well as irreparable harm to their reputations and goodwill and will continue to cause such harm unless enjoined by this court.

FIRST CAUSE OF ACTION

(Libel Per Se)

(All Plaintiffs)

27. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 26 above and incorporate them by reference as though fully set forth herein.

28. Plaintiffs allege, upon information and belief, that Defendants have willingly, without justification and without privilege, published false and defamatory statements claiming Rosland "rips off" its clients and imputing criminal conduct on both Aleksov and Ziontz.

29. Defendants' published statements regarding Plaintiffs are libelous on their face under California Civil Code § 45(a), as they have a tendency to injure Rosland's and Aleksov's business reputations in the precious metals industry, and Plaintiff Ziontz's in the legal field.

30. Some of the defamatory statements were published via email to approximately 475 individuals, including hundreds of Plaintiff's existing and prospective clients.

31. Other defamatory statements were published via a Twitter site to hundreds of "followers", thousands of individuals "following" the site, and innumerable individuals who accessed the defamatory statements through other means.

32. At the time Defendants' published such defamatory statements, Defendants knew the statements were about the Plaintiffs, knew the statements were false and/or failed to take reasonable care to determine the truth or falsity of the statements.

33. As a direct and proximate result of Defendants' publication, Plaintiffs have suffered actual damage to their businesses, trades, professions, or occupations. By reason of Defendants' publications, Plaintiffs have suffered a decline of business, a loss of good will, and injury to their business reputations.

SECOND CAUSE OF ACTION

(Trade Libel)

(All Plaintiffs)

34. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 33 above and incorporate them by reference as though fully set forth herein.

1 35. Plaintiffs are informed and believe and thereon allege that Defendants, and each of
2 them, have made false, disparaging, and defamatory statements regarding Plaintiffs' business or
3 services and that Defendants knew such statements were false at the time they were made.

4 36. Defendants' statements relating to Plaintiffs were intentionally made in order to
5 injure Plaintiffs' business, business reputations, and ability to provide professional services, or
6 should have been recognized by Defendants as being likely to cause harm to Plaintiffs.

7 37. As a result of such trade libel, Plaintiffs have suffered actual pecuniary damage in
8 lost prospective business with existing and potential clients that were deterred from doing
9 business with Plaintiffs in an amount to be proven at trial.

10 **THIRD CAUSE OF ACTION**

11 **(Intentional Interference with Prospective Economic Advantage)**

12 **(All Plaintiffs)**

13 38. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1
14 through 37 above and incorporates them by reference as though fully set forth herein.

15 39. Plaintiffs have existing and prospective business relationships with various clients
16 in the precious metals industry and legal field with a probability of economic benefit from those
17 relationships.

18 40. At all relevant times, Defendants were aware of Plaintiffs' existing and reasonably
19 expected relationships with third party clients in the precious metals business and legal field,
20 and of Plaintiffs' probability of future economic benefit from those relationships.

21 41. Defendants knew of and intentionally interfered with Plaintiffs' prospective
22 business advantage by making and publishing libelous and slanderous statements about
23 Plaintiffs and their businesses in the precious metals industry or legal field. Defendants
24 expressly targeted Plaintiffs' clients and attempted to dissuade those clients from doing business
25 with Plaintiffs through threats and misrepresentations.

26 42. As a direct and proximate consequence of this interference, Plaintiffs' relationships
27 with their clients have been harmed, and Plaintiffs have suffered actual damage to their business
28 and trade. Plaintiffs have lost business prospects who would have otherwise continued to

1 conduct business with Plaintiffs or begun to conduct business with Plaintiffs.

2 **FOURTH CAUSE OF ACTION**

3 **(Negligent Interference with Prospective Economic Advantage)**

4 **(All Plaintiffs)**

5 43. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1
6 through 42 above and incorporate them by reference as though fully set forth herein.

7 44. At all relevant times, Defendants were aware or should have reasonably been
8 aware that if they did not act with due care, their acts would interfere with or disrupt Plaintiffs'
9 prospective economic advantages. Defendants therefore owed Plaintiff a duty to act with such
10 care.

11 45. Defendants breached that duty by engaging in wrongful conduct of making and
12 publishing misrepresentations about Plaintiffs, their business, and occupations. Defendants
13 should have known their statements would interfere with Plaintiffs' prospective economic
14 advantage.

15 46. As a direct and proximate consequence of Defendants' interference with Plaintiffs'
16 relationships with its clients, Plaintiffs have suffered actual damage to their business, trade, and
17 occupation. Plaintiffs have lost business clients who would have otherwise continued to
18 conduct business with Plaintiffs or begun to conduct business with Plaintiffs.

19 **FIFTH CAUSE OF ACTION**

20 **(Misappropriation of Trade Secrets)**

21 **(Plaintiffs Rosland And Aleksov)**

22 47. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1
23 through 46 above and incorporate them by reference as though fully set forth herein.

24 48. Plaintiffs Rosland and Aleksov have spent a significant amount of time, effort, and
25 money in the development, compilation, and maintenance of their customer list.

26 49. Plaintiffs Rosland's and Aleksov's customer list is a trade secret within the
27 meaning of California Civil Code § 3426.1 in that it derives economic value from not being
28 known to the public and is the subject of efforts that are reasonable under the circumstances to

1 maintain its secrecy.

2 50. Defendants improperly acquired the client list with the knowledge that it had
3 economic value and was kept secret from the public or business competitors.

4 51. Defendants improperly acquired the client list through improper means under
5 circumstances giving rise to a duty to maintain its secrecy, or from or through a person who
6 owed a duty to Plaintiffs.

7 52. Defendants improperly used the trade secret client list by contacting clients with
8 the intention of making misrepresentations about Plaintiffs Rosland and Aleksov in an effort to
9 harm their reputations and business.

10 53. As a direct and proximate consequence of Defendants' misappropriation of
11 Plaintiffs' trade secret, Plaintiffs have suffered actual damage to its business in an amount to be
12 proven at trial.

13 **SIXTH CAUSE OF ACTION**

14 **(Extortion pursuant to California Penal Code § 523)**

15 **(Plaintiff Aleksov)**

16 54. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1
17 through 53 above and incorporate them by reference as though fully set forth herein.

18 55. Defendants' misrepresentations were sent via email to Aleksov with the intent to
19 extort money under the false guise that he owed money to some unknown individual or entity.

20 56. Defendants, at the time they made the misrepresentations, knew that their
21 representations were false.

22 57. Defendants' emails threatened, expressly or by implication, that if monies were not
23 paid they would damage Aleksov's business, or expose or impute that Aleksov had committed a
24 crime.

25 58. As a direct and proximate result of Defendants' threats, Aleksov became severely
26 agitated and fearful thereby suffering shock, humiliation, emotional distress and general pain.

27 59. As a direct and proximate result of Defendants' threats, Aleksov expended
28 considerable monetary sums to investigate the false claims and identify the anonymous

perpetrator in an effort to protect Plaintiffs, their business and reputations.

60. Defendants' actions, conduct, misrepresentations and threats, identified herein, amounted to oppression, fraud, or malice towards all Plaintiffs within the meaning of California Civil Code § 3294.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. For a judgment that Defendants have committed libel per se under California Civil Code § 45 against all Plaintiffs;

2. For a judgment that Defendants have committed trade libel against all Plaintiffs;

3. For a judgment that Defendants intentionally interfered with Plaintiffs' prospective economic advantage;

4. For a judgment that Defendants negligently interfered with Plaintiffs' prospective economic advantage

5. For a judgment that Defendants misappropriated Rosland's and Aleksov's trade secrets;

6. For a judgment that Defendants have committed an extortion under California Penal Code § 523 against Aleksov;

7. For an entry of preliminary and thereafter permanent injunctive relief restraining and enjoining Defendants, and all of their agents, successors, and assigns, and all persons in active concert or participation with any of them, from making or publishing any further defamatory statements or misrepresentations against Plaintiffs;

8. For an entry of preliminary and thereafter permanent injunctive relief restraining and enjoining Defendants, and all of their agents, successors, and assigns, and all persons in active concert or participation with any of them, from negligently or intentionally interfering with any prospective economic opportunities of Plaintiffs;

9. For an entry of preliminary and thereafter permanent injunctive relief restraining and enjoining Defendants, and all of their agents, successors, and assigns, and all

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06/16/2014

persons in active concert or participation with any of them, from maintaining, using, utilizing, misappropriating, transferring, providing or disseminating the trade secret client list of Plaintiffs Rosland and Aleksov;

10. For an entry of preliminary and thereafter permanent injunctive relief restraining and enjoining Defendants, and all of their agents, successors, and assigns, and all persons in active concert or participation with any of them, from sending or delivering any letter or other writing expressing or implying any threat to commit an unlawful physical or financial injury, any threat to expose or impute any disgrace or crime, or any threat to expose any secret affecting Plaintiff Aleksov, his family members and relatives, business, or business associates;

11. For an award of compensatory damages in an amount to be determined at trial;

12. For an award of punitive damages in an amount to be determined at trial; and

13. For an award of attorneys' fees, costs, and such other relief as the Court shall deem just and proper.

Dated: June 16, 2014

DENTONS US LLP
ROD PACHECO
JUDITH SHOPHET SIDKOFF

By: 

ROD PACHECO

Attorneys for Plaintiff
ROSLAND CAPITAL LLC

DEMAND FOR JURY TRIAL

Plaintiffs demand a jury trial in this case.

Dated: June 16, 2014

DENTONS US LLP
ROD PACHECO
JUDITH SHOPHET SIDKOFF

By: 
ROD PACHECO

Attorneys for Plaintiff
ROSLAND CAPITAL LLC

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82263679

7102/91/90

FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address):

ROD PACHECO (SBN 112432); JUDITH SIDKOFF (SBN 267048)

DENTONS US LLP

601 S. Figueroa St., Suite 2500

Los Angeles, CA 90017

TELEPHONE NO.: (213) 623-9300

FAX NO.: (213) 623-9924

ATTORNEY FOR (Name): PLAINTIFFS

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 N. Hill Street

MAILING ADDRESS: 111 N. Hill Street, Los Angeles, CA 90012

CITY AND ZIP CODE: Los Angeles, CA 90012

BRANCH NAME: Stanley Mosk Courthouse

CASE NAME: Rosland Capital LLC v. Doe Nos. 1-25

FILED
 Superior Court of California
 County of Los Angeles

JUN 16 2014

By [Signature] Executive Officer/Clerk
 Deputy
 Judicial Clerk

CIVIL CASE COVER SHEET

☒ **Unlimited** (Amount demanded exceeds \$25,000) ☐ **Limited** (Amount demanded is \$25,000 or less)

Complex Case Designation

☐ **Counter** ☐ **Joinder**
 Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

BC 548822

JUDGE:

DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

- ☐ Auto (22)
☐ Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- ☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

- ☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☒ Defamation (13)
☐ Fraud (16)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)

Employment

- ☐ Wrongful termination (36)
☐ Other employment (15)

Contract

- ☐ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)

Real Property

- ☐ Eminent domain/Inverse condemnation (14)
☐ Wrongful eviction (33)
☐ Other real property (26)

Unlawful Detainer

- ☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)

Judicial Review

- ☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

- ☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

- ☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint

- ☐ RICO (27)
☐ Other complaint (not specified above) (42)

Miscellaneous Civil Petition

- ☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): 6

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 16, 2014

ROD PACHECO

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability (not asbestos or toxic/environmental) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
- Legal Malpractice
- Other Professional Malpractice (not medical or legal)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease
- Contract (not unlawful detainer or wrongful eviction)
- Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case—Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (not provisionally complex) (18)
- Auto Subrogation
- Other Coverage
- Other Contract (37)
- Contractual Fraud
- Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
- Writ of Possession of Real Property
- Mortgage Foreclosure
- Quiet Title
- Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
- Writ—Administrative Mandamus
- Writ—Mandamus on Limited Court Case Matter
- Writ—Other Limited Court Case Review
- Other Judicial Review (39)
- Review of Health Officer Order
- Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
- Abstract of Judgment (Out of County)
- Confession of Judgment (non-domestic relations)
- Sister State Judgment
- Administrative Agency Award (not unpaid taxes)
- Petition/Certification of Entry of Judgment on Unpaid Taxes
- Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (not specified above) (42)
- Declaratory Relief Only
- Injunctive Relief Only (non-harassment)
- Mechanics Lien
- Other Commercial Complaint Case (non-tort/non-complex)
- Other Civil Complaint (non-tort/non-complex)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (not specified above) (43)
- Civil Harassment
- Workplace Violence
- Elder/Dependent Adult Abuse
- Election Contest
- Petition for Name Change
- Petition for Relief From Late Claim
- Other Civil Petition

SHORT TITLE:
ROSLAND CAPITAL, LLC, et al. v. DOE NOS. 1-25, inclusive

CASE NUMBER

BC548822

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL ☐ HOURS/ ☐ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

1. Class actions must be filed in the Stanley Mosk Courthouse, central district.
2. May be filed in central (other county, or no bodily injury/property damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 3.
		<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4.

ORIGINAL

SHORT TITLE:

ROSLAND CAPITAL, LLC, et al. v. DOE NOS. 1-25, inclusive

CASE NUMBER

Non-Personal Injury/ Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property
Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input checked="" type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.



SHORT TITLE:

ROSLAND CAPITAL, LLC, et al. v. DOE NOS. 1-25, inclusive

CASE NUMBER

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ/Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.



SHORT TITLE:

ROSLAND CAPITAL, LLC, et al. v. DOE NOS. 1-25, inclusive

CASE NUMBER

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS:
CITY:	STATE:	ZIP CODE: 90401

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the _____ courthouse in the _____ District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated:

6-16-14



(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

6-16-2014



General Information

Court	Superior Court of California, County of Los Angeles
Docket Number	BC548822